

October 22, 2003

Agency Name: National Highway Transportation Safety Administration

Docket Number: NHTSA-03-14396

To Whom It May Concern:

I support the rule change to exempt RCC horizontal discharge semi-trailers from Federal Motor Vehicle Safety Standard Number 224.

The under-ride guard required of trailer manufactures does not work in the construction industry. It does not allow the amount of overhang that is required to dump into a paving machine without spilling onto the road surface. Another problem with the under-ride guard is that most paving machines and shoulder machines are designed with rollers on the front of the machine. The rollers push against the tires of the trailer. This allows the machine to push the trailer so that the trailer and machine do not separate during the discharge cycle. If separation occurs, the material is dumped onto the road between the two units; this creates a high risk to employees when they have to get between the two units to clean up the material spill.

The "wheels back" configuration creates the same overhang problem as the under-ride guard.

The horizontal discharge trailer is important to the construction industry. It allows us to work in areas with overhead wires, where it is not safe to use dump trucks. Overhead electrical wires create a risk of personal injury or death to our employees. Horizontal discharge trailers also work well in areas with uneven or unstable ground, where there is the potential to tip-over a dump truck. Work Zone Safety is import to the construction industry. Without these trailers I feel that risk to our employees will increase.

In my opinion it would also be difficult to bid on and complete some road construction and maintenance jobs, especially in the metropolitan areas.

Thank you for considering these comments to amend FMVSS No.224.

Sincerely,
Greg Ollinger
Transportation Manager
Manatt's, Inc.